

REMARKS

Claims 1 – 18 are pending in the application. Claims 1 – 18 stand rejected under 35 U.S.C. 101 and 35 U.S.C. 102 (b). Claim 18 has been cancelled herein responsive to the objection under 37 CFR 1.75(c). Claims 1 – 17 include independent claims 1, 4, 7, 10, 13, and 16.

The Applicant respectfully disagrees with the Examiner's rejection of all claims under 101 as noted in the remarks below, particularly as the rejection relates to independent claim 13 and 16 and claims depending there from as they are method claims and not data structure claims as the Examiner indicates. Independent claims 1, 4, 7, and 10 have been amended for clarity.

With regard to the rejection under 102 (b), the Sanderson patent publication does not anticipate all of the recited claim limitations as noted herein. Further, Sanderson is unrelated in that it is primarily a browser application tool that attempts to address the paradox between choosing a simple, low bandwidth, low maintenance HTML based User Interface (UI) application or a more robust, high bandwidth, high maintenance UI application. Sanderson also attempts to resolve the problems with an intermediate solution of using applets (little applications) that can be shipped over from a server application and can be executed by a browser at run time to provide a more robust UI. Sanderson teaches that use of the applets simply increases the bandwidth problem. Sanderson teaches a browser application tool that utilizes workflow data defined tasks and data descriptions to construct a UI. The browser application of Sanderson allows the data to be the driver for defining tasks and selecting widgets.

To the contrary, the present application does not teach or claim a browser application tool, but teaches a tool for a client-server environment where integrated repositories, or frameworks, have been defined whereby all UI data elements and fields are conformed to fit within the frameworks so that the screens have a predictable appearance and data handling is predictable. It is this predictability that allows a software developer to quickly develop or modify a UI application in a client-server environment without performing rudimentary coding of software. Whereas, Sanderson teaches a different approach where the UI generator browser application allows the data to define the tasks and widgets. Therefore, this data centric characteristic and this browser centric characteristic of Sanderson makes Sanderson a dynamic application based on data flow, however, the present application is compiled application. The applicant requests that the remarks and amendments be entered and that the claims as amended herein be allowed to proceed to issuance.

The Examiner objected to claim 18 under 37 CFR 1.75(c), as being an improper dependent claim for failing to further limit the subject matter of the claim from which it depends. The Applicant cancels claim 18 herein, thereby overcoming this rejection.

The Examiner rejected claims 1 – 18 under 35 U.S.C. 101 indicating that the claimed invention is directed to non-statutory subject matter, specifically indicating that the claims are directed to a data structure. However, clearly independent claims 13 and 16 and the claims depending there from are not data structure claims, but are method claims, which provide a tangible output. With regard to independent claims 1, 4, 7, and 10 and the claims depending there from, there are clear functional interrelations between the frameworks that are recited in the claims. For example, independent claim 1 recites a UI repository in a database having a UI

element and a data binding framework operable to bind data to the UI element of the UI repository and GUI component of the GUI framework. The screen repository is clearly interrelated to the GUI framework and the navigation framework by the GUI component and screen attributes.

Further, Data Structure Claims sometimes referred to as *Lowry* Claims In re Lowry, 32 F.3d 1579, (Fed. Cir 1994) are clearly patentable subject matter and weight should be given to the functional interrelations of the data structures, in this case in a client-server environment that can be accessed by various object oriented software applications executing in the client-server environment. The limitations are recited as residing on and accessible to a client-server network environment and are functionally interrelated as noted above, which clearly indicates that they are accessible by graphical user interface applications executing in the client-server network environment. However, the Applicant has further amended claims 1, 4, 7 and 10 to further clarify this point. Therefore, the Applicant respectfully asserts that the rejection under 101 has been overcome based on this response.

The Examiner rejected claims 1 – 18 under 35 U.S.C. 102 (b) as being anticipated by patent application publication (20020101448) published on behalf of Sanderson.

With regard to independent claim 1, the Examiner asserts that all claim limitations are anticipated by Sanderson. However, the UI repository recited in claim 1 is not anticipated by the data factory 210 and the data element 208 taught by Sanderson. Specifically, the UI repository framework (see paragraphs 23, 46-49, 57-59, and 65) is a defined data field repository, which includes a UI element that defines attributes. The UI element as recited in claim 1 is not the

same as the data element 208 taught by Sanderson. Data elements 208 represent actual data, requests or commands (see paragraphs 0046 and 0047 of Sanderson), whereas a UI element as recited in claim 1 of this application defines attributes. Unlike the Examiners use of data element 208, the content specifications 209 are not relied on by the Examiner to support the argument of anticipation. However, even if the Examiner opts to combine 208, 209, and 210, the combination still does not anticipate the UI repository including a UI element, because the UI repository is a macro framework of attributes and data is bound to the UI element of the repository, which includes how to display the data, whereas 208, 209, and 210 of Sanderson does not anticipate such a UI element (See paragraphs 54, 55 and 56 of Sanderson).

Further, the Examiner asserts that the content specification 209 anticipates the screen repository, however, 209 doesn't remotely relate to a screen repository (see paragraphs 24, 54, 55 and 66 of this application) having screen attributes, which define the hierarchical navigation tree structure and further defines what screen will be constructed. Content specification 209 relates only to the definition of the data and provides the widget factory with information for production of a widget factory.

The Examiner asserts that the content factory 213 (see paragraphs 51-53 of Sanderson) anticipates the data binding framework, however, the content factory is an object factory and doesn't bind data to a UI element and GUI component, but only prepares data for transmission to a content server.

The Examiner asserts that the controller 201(c) of Sanderson (see paragraphs 37-39, and 48, of Sanderson) anticipates the GUI framework, however, the controller of Sanderson is part of

the task function, which is the client side representation of a server side object and is responsible for communications with the content server. The controller function ties together the other functions of the task, which does not relate to controlling the handling and processing of data within a GUI component including controlling the binding of data to the GUI component.

The Examiner asserts that the view 201b and model 201a taught by Sanderson anticipates the navigation framework, however, neither build a navigation tree structure (see paragraph 77 in this application).

Therefore, the applicant asserts that Sanderson does not anticipate all limitations of claim 1 and further asserts that claim 1 as amended and claims 2 and 3 depending there from are in condition for allowance.

With regard to claim 4, Sanderson does not anticipate the GUI framework or the navigation framework for the same reasons as stated above for claim 1. Therefore, the applicant asserts that Sanderson does not anticipate all limitations of claim 4 and further asserts that claim 4 as amended and claims 5 and 6 depending there from are in condition for allowance.

With regard to claim 7, Sanderson does not anticipate the Screen repository, the UI repository or the Data Binding framework for the same reasons as stated above for claim 1. Therefore, the applicant asserts that Sanderson does not anticipate all limitations of claim 7 and further asserts that claim 7 as amended and claims 8 and 9 depending there from are in condition for allowance.

With regard to claim 10, Sanderson does not anticipate the Navigation tool, the Screen repository tool, the UI tool or the Data Binding tool for the same reasons as stated above for

claim 1. Therefore, the applicant asserts that Sanderson does not anticipate all limitations of claim 10 and further asserts that claim 10 as amended and claims 11 and 12 depending there from are in condition for allowance.

With regard to claim 13, the step of accessing and constructing a basic screen and screen attributes from a screen repository corresponding to the user input as determined by a navigation framework is not anticipated by Sanderson, because a screen repository and navigation framework are not taught by Sanderson as stated above for claim 1. Therefore, the applicant asserts that Sanderson does not anticipate all limitations of claim 13 and further asserts that claim 13 as amended and claims 14 and 15 depending there from are in condition for allowance.

With regard to claim 16, the step of building a graphical user interface (GUI) framework operable to reside at a client in a client-server network environment, where said GUI framework is operable to control how data is handled and processed within a GUI component of a GUI application including binding data to the GUI component utilizing a data binding framework, is not anticipated by Sanderson, because the GUI framework and the Data Binding framework are not taught by Sanderson as stated above for claim 1. Therefore, the applicant asserts that Sanderson does not anticipate all limitations of claim 16 and further asserts that claim 16 as amended and claim 17 depending there from are in condition for allowance.

Applicant asserts that claims 1 – 17 are now in condition for allowance and requests that said claims be allowed to proceed to issuance base on this response.

If any issue regarding the allowability of any of the pending claims in the present application could be readily resolved, or if other action could be taken to further advance this

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Amendment A

application such as an Examiner's amendment, or if the Examiner should have any questions regarding the present amendment, it is respectfully requested that the Examiner please telephone Applicant's undersigned attorney in this regard.

Respectfully submitted,

Date:

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A handwritten signature in dark ink, appearing to read "Mark E. Stallion", written over a horizontal line.

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